

Approved:



BEN ARAD

Assistant United States Attorney

Before: THE HONORABLE ANDREW E. KRAUSE  
United States Magistrate Judge  
Southern District of New York

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UNITED STATES OF AMERICA	:	<u>COMPLAINT</u> 23mj586
- v. -	:	Violation of 8 U.S.C.
CLEVELAND DOUSE,	:	§ 1326(a) & (b) (1)
a/k/a "Steven Sadiki Douse"	:	COUNTY OF OFFENSE:
	:	WESTCHESTER
	:	

- - - - - X  
SOUTHERN DISTRICT OF NEW YORK, ss.:

RODRIGO J. GONZALEZ, being duly sworn, deposes and says that he is a Deportation Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and charges as follows:

COUNT ONE  
(Illegal Reentry)

1. From at least in or about March, 2022, in the Southern District of New York and elsewhere, CLEVELAND DOUSE, a/k/a "Steven Sadiki Douse," the defendant, being an alien, unlawfully did enter, and was found in, the United States, after having been removed from the United States subsequent to a conviction for the commission of a felony, without having obtained the express consent of the Attorney General of the United States or his successor, the Secretary for the Department of Homeland Security, to reapply for admission.

(Title 8, United States Code, Section 1326(a) and (b) (1).)

The bases for my knowledge and the foregoing charge are, in part, as follows:

2. I am an Officer with the United States Department of Homeland Security, Immigration and Customs Enforcement ("ICE"), and I have been personally involved in the investigation of this

matter. This affidavit is based in part upon my conversations with law enforcement agents and others and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. From my review of records maintained by ICE and gathered from other law enforcement agencies regarding CLEVELAND DOUSE, a/k/a "Steven Sadiki Douse," the defendant, I have learned, among other things, the following:

a. DOUSE is a native and citizen of Jamaica. He is not, and never has been, a citizen of the United States.

b. On or about May 2, 1996, DOUSE was admitted to the United States, in Miami, Florida, as a lawful permanent resident.

c. On or about September 25, 2001, DOUSE was arrested by the Albany City Police Department in the City of Albany, New York. DOUSE's fingerprints were taken following this arrest (the "2001 Fingerprints"). On or about April 2, 2002, DOUSE pleaded guilty to Criminal Possession of a Controlled Substance in the Fifth Degree, in violation of New York Penal Law § 220.06(01). DOUSE was sentenced to a term of 5 years of probation. Based on my training and experience with ICE and my consultation with other ICE personnel, I understand that the foregoing offense qualifies as a "felony" within the meaning of Section 1326(b)(1) of Title 8 of the United States Code.

d. On or about February 3, 2003, pursuant to an Order of Removal entered on or about November 15, 2002, DOUSE was removed from the United States. Prior to his removal, a print of DOUSE's right index finger was taken by ICE (the "2003 Fingerprint").

e. On an unknown date after on or about February 3, 2003, DOUSE illegally re-entered the United States, at an unknown location, apparently without inspection by any United States immigration authority.

f. On or about April 5, 2007, DOUSE was arrested by the Prince Georges County Police Department in Maryland.

DOUSE's fingerprints were taken following this arrest (the "2007 Fingerprints"). On or about July 9, 2010, DOUSE pleaded guilty to illegally reentering the United States after having been removed, following a conviction for an aggravated felony, in violation of Title 8, United States Code, § 1326(b)(2). DOUSE was sentenced to a term of 35 months' imprisonment. Based on my training and experience with ICE and my consultation with other ICE personnel, I understand that the foregoing offense qualifies as a "felony" within the meaning of Section 1326(b)(1) of Title 8 of the United States Code.

g. On or about July 28, 2011, pursuant to an Order of Removal entered on or about May 6, 2011, DOUSE was removed from the United States. Prior to his removal, a print of DOUSE's right index finger was taken by ICE (the "2011 Fingerprint").

h. On an unknown date after on or about July 28, 2011, DOUSE illegally re-entered the United States, at an unknown location, apparently without inspection by any United States immigration authority.

i. From at least in or about December 2022, DOUSE resided in the City of Mount Vernon, New York.

j. On or about January 17, 2023, DOUSE was placed under administrative arrest by ICE in Queens, New York. DOUSE's fingerprints were taken following his arrest (the "2023 Fingerprints").

4. Based on my review of a fingerprint comparison report prepared by the Federal Bureau of Investigation, I have learned, in substance and in part, that the (a) 2001 Fingerprints, (b) 2003 Fingerprint, (c) 2007 Fingerprints, (d) 2011 Fingerprint, and (e) 2023 Fingerprints all came back to, and have been identified with, one and the same individual, CLEVELAND DOUSE, a/k/a "Steven Sadiki Douse," the defendant, or an alias he has used.

5. A search of all relevant Department of Homeland Security indices has confirmed that, following his removal from the United States on or about November 18, 2002, CLEVELAND DOUSE, a/k/a "Steven Sadiki Douse," the defendant, never obtained the express consent of the Attorney General of the United States, or the Secretary for the Department of Homeland Security, to reapply for admission to the United States.

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of CELVELAND DOUSE, a/k/a "Steven Sadiki Douse," the defendant, and that he be arrested and imprisoned or bailed, as the case may be.



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RODRIGO J. GONZALEZ  
Deportation Officer  
U.S. Department of Homeland Security

Sworn to before me this  
24th day of January, 2023.



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THE HONORABLE ANDREW E. KRAUSE  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK